

1 EDMUND G. BROWN JR., Attorney General
of the State of California
2 MARC GREENBAUM,
Supervising Deputy Attorney General
3 CHRISTINA THOMAS,
Deputy Attorney General, State Bar No. 171168
4 300 So. Spring Street, Suite 1702
Los Angeles, CA 90013
5 Telephone: (213) 897-2557
Facsimile: (213) 897-2804
6

7 Attorneys for Complainant

8 **BEFORE THE**
9 **BOARD OF REGISTERED NURSING**
10 **DEPARTMENT OF CONSUMER AFFAIRS**
11 **STATE OF CALIFORNIA**

12 In the Matter of the Accusation Against:

Case No. 2010-190

13 REBECCA JOANNE PUHR
15800 Lasselle Street, Apt. N
Moreno Valley, CA 92551

A C C U S A T I O N

14 Registered Nurse License No. 599025

15 Respondent.

16
17 Complainant alleges:

18 **PARTIES**

19 1. Louise R. Bailey, M.Ed. RN (Complainant) brings this Accusation solely
20 in her official capacity as the Interim Executive Officer of the Board of Registered Nursing,
21 Department of Consumer Affairs.

22 2. On or about May 6, 2002, the Board of Registered Nursing (Board) issued
23 Registered Nurse License Number 599025 to Rebecca Joanne Puhr (Respondent). The
24 Registered Nurse License was in full force and effect at all times relevant to the charges brought
25 herein and will expire on January 31, 2010, unless renewed.

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1 **FIRST CAUSE FOR DISCIPLINE**

2 **(Convictions of Substantially-Related Crimes)**

3 8. Respondent is subject to disciplinary action under section 490, and
4 section 2761, subdivisions (f), in conjunction with California Code of Regulations, Title 16,
5 section 1444, in that Respondent was convicted of crimes substantially related to the
6 qualifications, functions or duties of a Registered Nurse as follows:

7 a. On or about October 16, 2008, after pleading guilty, Respondent was
8 convicted of one misdemeanor count of violating Penal Code section 459 [burglary], in the
9 criminal proceeding entitled *The People of The State of California v. Rebecca Joanne Puhr*
10 (Super. Ct. Ventura County, 2008, No. 2008032848). Respondent was sentenced to 30 days in
11 jail. The circumstances surrounding the conviction are that on or about August 5, 2008,
12 Respondent was arrested after she ordered and consumed food at the Black Angus Restaurant in
13 Ventura, California, and attempted to pay with a canceled Visa card.

14 b. On or about October 16, 2008, after pleading not guilty, Respondent was
15 convicted of one misdemeanor count of violating Penal Code section 148, subdivision (a)(1)
16 [resisting arrest], and two misdemeanor count of violating Penal Code section 484,
17 subdivision (a), in the criminal proceeding entitled *The People of The State of California v.*
18 *Rebecca Joanne Puhr* (Super. Ct. Ventura County, 2008, No. 2008015785). On September 24,
19 2008, *The People of The State of California v. Rebecca Joanne Puhr* (Super. Ct. Ventura County,
20 2008, No. 2008022436) was consolidated into Case No. 2008015785. Respondent was
21 sentenced to 120 days in jail and placed on 3 years probation. The circumstances surrounding the
22 convictions are that on or about April 17, 2008, and on or about June 3, 2008, Respondent was
23 arrested after she ordered and consumed food without paying in Ventura, California.

24 c. On or about October 20, 2008, after pleading guilty, Respondent was
25 convicted of one misdemeanor count of violating Penal Code section 537, subdivision (a)(1)
26 [defrauding an innkeeper], in the criminal proceeding entitled *The People of The State of*
27 *California v. Rebecca Joanne Puhr* (Super. Ct. Ventura County, 2008, No. 2008013226).
28 Respondent was sentenced to 2 days in jail, and placed on 3 years probation. The circumstances

1 surrounding the conviction are that on or about April 1, 2008, Respondent was arrested after she
2 ordered and consumed food without paying at China Dynasty Restaurant in Ventura, California.

3 **PRAYER**


4 WHEREFORE, Complainant requests that a hearing be held on the matters herein
5 alleged, and that following the hearing, the Board issue a decision:

6 1. Revoking or suspending Registered Nurse License Number 599025, issued
7 to Respondent;

8 2. Ordering Respondent to pay the Board the reasonable costs of the
9 investigation and enforcement of this case, pursuant to Business and Professions Code section
10 125.3; and,

11 3. Taking such other and further action as deemed necessary and proper.
12

13 DATED: 10/15/09
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16 LOUISE R. BAILEY, M.ED. RN
17 Interim Executive Officer
18 Board of Registered Nursing
19 Department of Consumer Affairs
20 State of California
21 Complainant
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